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10 | *Attorneys for Fire Victim Trustee*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

15 | In re:

**Bankruptcy Case  
No. 19-30088 (DM)**

16 | PG&E CORPORATION

## Chapter 11 (Lead Case) (Jointly Administered)

## 18 | PACIFIC GAS AND ELECTRIC COMPANY

## Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

**STATUS CONFERENCE STATEMENT  
REGARDING MOTION OF THE FIRE  
VICTIM TRUSTEE PURSUANT TO  
FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 2004 FOR ENTRY OF AN  
ORDER AUTHORIZING SERVICE OF  
SUBPOENAS ON THE SUBROGATION  
WILDFIRE TRUST, SUBROGATION  
WILDFIRE CLAIMANTS, AND  
INSURERS WITH CLAIM FILES**

24 \*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)

1           The Honorable John K. Trotter (Ret.), in his capacity as the Fire Victim Trustee  
2 (the “Trustee”), by and through his undersigned counsel, hereby submits this *Status Conference*  
3 *Statement* regarding the Rule 2004 Motion [Dkt. No. 9483] filed on November 9, 2020.<sup>1</sup>

4           **First Supplement.** On November 13, 2020, the Trustee filed the First Supplement [Dkt.  
5 No. 9514] to the Rule 2004 Motion and identified parties on Exhibit 1 thereto, including related  
6 parties and affiliates, that have Claim Files and claims-related documents for insured fire victims.  
7 The First Supplement was filed in response to the Order entered by this Court on November 10,  
8 2020, requesting that the Trustee identify the respondents of the Subpoenas. *See* Dkt. No. 9489.

9           **Second Supplement.** On November 20, 2020, the Trustee filed the Second Supplement  
10 [Dkt. No. 9585] to the Rule 2004 Motion and withdrew without prejudice the Rule 2004 Motion to  
11 the extent that it sought authority to serve Subpoenas on the “Cooperating Carriers” identified on  
12 Exhibit A to the Second Supplement. The Rule 2004 Motion, as amended by the First Supplement  
13 and the Second Supplement, sought authority to serve Subpoenas on (i) the “Non-Cooperating  
14 Carriers” identified on Exhibit B to the Second Supplement and (ii) the Wildfire Subrogation Trust.

15           **Rule 2004 Order.** On November 23, 2020, the Court entered an Order authorizing the  
16 Trustee to serve Subpoenas on the “Non-Cooperating Carriers” identified on Exhibit B to the  
17 Second Supplement. *See* Dkt. No. 9594 (the “**Rule 2004 Order**”). Pursuant to the Rule 2004  
18 Order, on December 4, 2020, the Trustee served Subpoenas on certain of the Non-Cooperating  
19 Carriers. *See* Dkt. No. 9722. By the Rule 2004 Order, the Court also set a status conference for  
20 December 15, 2020, to address any unresolved Rule 2004 issues between the Fire Victim Trust and  
21 the Subrogation Wildfire Trust and directed counsel for the Fire Victim Trust to file a Status  
22 Conference Statement with the Court no later than December 11, 2020. *Id.*

23           **Stipulation.** On December 1, 2020, the Fire Victim Trust and the Subrogation Wildfire  
24 Trust entered into a *Stipulated Confidentiality and Protective Order on the Production*  
25 *of Certain Claims Information* [Dkt. No. 9676] (the “**Stipulation**”), which Stipulation was filed  
26 with the Court on December 2, 2020. Also, on December 2, 2020, the Fire Victim Trust, with the

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27           <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Rule 2004 Motion.  
28

1 consent of the Wildfire Subrogation Trust, filed a Notice of Withdrawal Without Prejudice of the  
2 Rule 2004 Motion [Dkt. No. 9686] (the “**Withdrawal Notice**”) to the extent that it sought authority  
3 to serve a Subpoena on the Wildfire Subrogation Trust. The Court entered an Order approving the  
4 Stipulation on December 7, 2020. *See* Dkt. No. 9753.

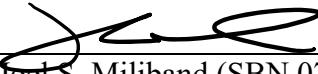
5       **Status Conference.** As a result of the Stipulation and the Withdrawal Notice, all issues  
6 remaining between the Fire Victim Trust and the Subrogation Wildfire Trust have been resolved.  
7 The Trustee does not believe that the status conference on the Rule 2004 Motion currently  
8 scheduled for December 15, 2020, is necessary. Further, as result of the Rule 2004 Order, the  
9 Stipulation and the Withdrawal Notice, the issues raised by the Rule 2004 Motion, as amended by  
10 the First Supplement and the Second Supplement, have been addressed.

11           The Trustee sincerely appreciates the Court’s attention to these matters.

12 DATED: November 9, 2020

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35           Claims Administrator for the Fire Victim Trust*